

1 DYLAN P. TODD
Nevada Bar No. 10456
2 TODD W. BAXTER
Admitted Pro Hac Vice
3 McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP
4 8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113
5 Telephone: (702) 949-1100
Facsimile: (702) 949-1101
6 *dylan.todd@mccormickbarstow.com*
todd.baxter@mccormickbarstow.com
7

8 ERON Z. CANNON
Nevada Bar No. 8013
9 FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN SPILLANE PLLC
10 701 5th Avenue #4750
Seattle, Washington 98104
11 Telephone: (206) 749-0094
Facsimile: (206) 749-0194
12 *eron@favros.com*

13 Attorneys for Plaintiffs

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
17 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
18 FIRE & CASUALTY INSURANCE
COMPANY,

19 Plaintiffs,

20 v.

21 MARJORIE BELSKY, MD; MARIO
22 TARQUINO, MD; MARJORIE BELSKY,
MD, INC., doing business as INTEGRATED
23 PAIN SPECIALISTS; and MARIO
TARQUINO, MD, INC., DOES 1-100, and
24 ROES 101-200,

25 Defendants.

26 AND RELATED CLAIMS
27
28

CASE NO. 2:15-cv-2265-MMD-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINE REGARDING
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION FOR
ATTORNEYS' FEES RELATED TO
THEIR MOTION TO COMPEL
PLAINTIFFS' COMPLIANCE WITH
FEDERAL RULE OF CIVIL
PROCEDURE 26(A)(1)(A)(III)**

(First Request)

1 **STIPULATION AND ORDER TO EXTEND DEADLINE REGARDING**
2 **PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR ATTORNEYS' FEES**
3 **RELATED TO THEIR MOTION TO COMPEL PLAINTIFFS' COMPLIANCE WITH**
4 **FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)(A)(III)**

5 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
6 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
7 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (collectively, the "Allstate
8 Parties"), and Defendants/Counterclaimants MARJORIE BELSKY, M.D., MARIO TARQUINO,
9 M.D., MARJORIE BELSKY, M.D., INC. d/b/a INTEGRATED PAIN SPECIALISTS, and MARIO
10 TARQUINO, M.D., INC. (collectively, the "Belsky/Tarquino Parties"), by and through their
11 respective attorneys of record, stipulate and agree as follows:

12 1. On November 9, 2017, the Belsky/Tarquino Parties filed their Motion for Attorneys'
13 Fees Related to Their Motion to Compel Plaintiffs' Compliance with Federal Rule of Civil Procedure
14 26(A)(1)(A)(III) [ECF No. 234] (the "Fee Motion");

15 2. Per court rules, the deadline for the Allstate Parties' response to the Fee Motion is
16 Friday, November 24, 2017;

17 3. Due to the fact that the deadline falls during the week of Thanksgiving, the Allstate
18 Parties shall have an extension of one (1) week, until Friday, December 1, 2017 to respond to the
19 Belsky/Tarquino Parties' Fee Motion; and

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 14th day of November, 2017, a true and correct copy
3 of **STIPULATION AND ORDER TO EXTEND DEADLINE REGARDING PLAINTIFFS'**
4 **RESPONSE TO DEFENDANTS' MOTION FOR ATTORNEYS' FEES RELATED TO THEIR**
5 **MOTION TO COMPEL PLAINTIFFS' COMPLIANCE WITH FEDERAL RULE OF CIVIL**
6 **PROCEDURE 26(A)(1)(A)(III)** was served via the United States District Court CM/ECF system on
7 all parties or persons requiring notice.

8 Dennis Kennedy, Esq.
9 Josh Gilmore, Esq.
10 BAILEY KENNEDY
11 8984 Spanish Ridge Avenue
12 Las Vegas, NV 89148
13 (702) 562-8820 Tel
14 (702) 562-8821 Fax
15 jgilmore@baileykennedy.com

16 By



17 Tricia A. Dorner, an Employee of
18 MCCORMICK, BARSTOW, SHEPPARD,
19 WAYTE & CARRUTH LLP

20 03246-01560 4807910.1